REMARKS

Reconsideration and allowance are respectfully respected in view of the foregoing amendments and the following remarks.

Claims 1-6, 8, 9, 28, 29, 31, 32, 34, 35, 37, 38, 42-49, 51-58, and 60-65 are pending. Claims 7, 10-27, 30, 33, 36, 39-41, 50, and 59 have been canceled without prejudice or disclaimer. Claims 1, 2, 4, 6, 8, 28, 29, 31, 32, 34, 35, 37, 38, 42-49, 52, 54, 56-58, 61, 63, and 65 have been amended.

I. Change of Address

Applicants submit herewith a copy of the Revocation and New Power of Attorney (**with Change of Correspondence Address**) submitted on September 10, 2002. Applicants respectfully request that the correspondence address be duly changed as provided therein.

II. Claim Rejections – 35 U.S.C. § 101

The Examiner rejected claims 1-7, 9-16, 18, 28-33, and 37-56 under 35 U.S.C. § 101 as allegedly being directed to nonstatutory subject matter. In particular, the Examiner alleged that "[c]laims 1, 10 are directed to non-functional descriptive data." The Examiner also apparently views "software components," software elements," and "details of software" as "non-tangible elements" that do not constitute statutory subject matter.

Applicants respectfully assert that the Examiner has misapplied the law of statutory subject matter as it relates to computer-implemented inventions.

MPEP § 2106(IV)(B)(1)(b) states that "nonfunctional descriptive material" is "[d]escriptive material that cannot exhibit any functional interrelationship with the way in which computing processes are performed." "Office personnel should consider the claimed invention as a whole to determine whether the necessary functional interrelationship is provided." *Id.* (emphasis added).

Applicants respectfully submit that Applicants' claimed invention does not constitute "nonfunctional descriptive material." On the contrary, functional interrelationships are indeed present in the claims. Examples of such interrelationships in claim 1, as amended, include:

1. receiving a read data request or a write data request or a request to perform an operation
2. managing communications connections and request queues
3. checking a security authorization and control
4. transmitting the request
5. etc.

Clearly, Applicants' claimed invention involves many functional interrelationships. Accordingly, the subject matter of the claims is statutory.

The MPEP is very clear that the mere presence of "software components" in claims does not render the claims per se nonstatutory. In fact, computer-implemented processes and machines are statutory when "limited to a practical application." According to the MPEP:

> A claim is limited to a practical application when the method, as claimed, produces a concrete, tangible and useful result; i.e., the method

> recites a step or act of producing something that is concrete, tangible and useful. See *AT&T*, 172 F.3d at 1358, 50 USPQ2d at 1452. Likewise, a machine claim is statutory when the machine, as claimed, produces a concrete, tangible and useful result (as in *State Street*, 149 F.3d at 1373, 47 USPQ2d at 1601) and/or when a specific machine is being claimed (as in *Alappat*, 33 F.3d at 1544, 31 USPQ2d at 1557 (in banc).

MPEP § 2106(IV)(B)(2)(b)(ii) (emphasis added).

Applicants submit that the claims of the present application are "limited to a practical application" which produces a "concrete, tangible and useful result." For instance, in the respective apparatus and method of claims 1 and 31, as amended, a data response is transmitted to a client application, which application is not compatible with a target database. This response is made responsive to a request of the client relating to the incompatible target database. Similarly, in the apparatus of claim 28, a data response is transmitted to a system domain server responsive to client requests. It is well-established that transmitting data is a concrete, tangible, and useful result, and that the Patent Office has issued many patents with data transmission features. Therefore, Applicants' claims clearly produce concrete, tangible and useful results.

Accordingly, Applicants respectfully submit that the Examiner's rejection of the claims under 35 U.S.C. § 101 should be withdrawn.

III. Claim Rejections – 35 U.S.C. § 112

The Examiner rejected claims 1-9, 10-18, 19-27, 37-47, 48-56, and 57-65 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter regarded as the invention.

Applicants have amended claim 1 to recite "a security authorization."

Applicants have canceled claims 10 and 19 without prejudice or disclaimer.

Applicants have amended claims 1, 37, 48, and 57 to clarify that the "request to perform an operation" or "operation request" is transmitted and/or responded to, like the read data and write data requests.

Therefore, Applicants submit that the pending claims are not indefinite, and respectfully requests that the Examiner's rejection be withdrawn.

IV. Claim Rejections – 35 U.S.C. § 103

The Examiner rejected claims 1-65 under 35 U.S.C. § 103(a) as being unpatentable over Beck et al. (U.S. Patent No. 6,167,395) in view of Lee et al. (U.S. Patent No. 6,493,752). Applicants respectfully traverse the rejection. However, various claims have been amended to more precisely describe embodiments of the present invention. Additionally, claims 7, 10-27, 30, 33, 36, 39-41, 50, and 59 have been canceled, and the rejection of such claims is overcome.

A. Embodiments of Applicants' Invention

Applicants developed, among other things, systems and methods for vehicle organizations. Such systems and methods, for example, provide virtual compatibility between incompatible SQL client applications and target flat or multi-value databases associated with a

vehicle dealership. In addition, such systems and methods can improve security of computer systems that exchange information with external systems.

As recited in amended independent claims 1, 28, 31, 34, 37, 48, and 57, a request from an SQL relational database compatible client application is received. The request is regarding a flat or multi-value database that is incompatible with the client application. The database is associated with a vehicle dealership. Via Applicants' innovative processing, a data response is received for the request, which response is compatible with the client application. Accordingly, virtual compatibility is achieved, wherein SQL client applications can access flat or multi-value target databases that otherwise could not be accessed.

B. The Claims Are Not Obvious over Beck in View of Lee

Neither Beck nor Lee, taken alone or in combination, discloses, teaches, or suggests each and every limitation of independent claims 1, 28, 31, 34, 37, 48, and 57.

In particular, neither Beck nor Lee discloses, teaches, or suggests, among other aspects, that:

- a request from an SQL relational database compatible client application is received;
- the request is regarding a flat or multi-value database that is incompatible with the client application;
- the database is associated with a vehicle dealership; and
- a data response is received for the request, which response is compatible with the client application.

Beck is devoid of any disclosure, teaching, or suggestion as to the above features. Instead, Beck discloses a multimedia call center for a telecommunications system. The call center supports multiple channels and forms of communication and stores call center transactions in a data repository. A threading software application has a programming input for a user to enter association criteria, an access function that accesses at least stored data in the data repository, and a search function that searches accessed data for association criteria. (Abstract.) Flat or multi-value databases are not in any way incorporated in the multimedia center.

Lee is similarly devoid of any disclosure, teaching, or suggestion as to the above features of Applicant's claimed invention. Lee discloses a device and method for graphically displaying data movement in a secured network. The security device 100 can use traditional packet filtering or traditional proxies to control access to and from various networks. (Col. 6, lines 39-38.)

For at least the above reasons, Applicants submit that independent claims 1, 28, 31, 34, 37, 48, and 57 are not obvious over Beck in view of Lee. Accordingly, the Examiner's rejection should be withdrawn.

Because dependent claims 2-6, 8, 9, 29, 32, 35, 38, 42-47, 49, 51-56, 58, and 60-65 respectively depend from independent claims 1, 28, 31, 34, 37, 48, and 57, those dependent claims are also not obvious for at least the above reasons, and the Examiner's rejection should be withdrawn.

V. Fink et al. and Derfler et al. Are Not Prior Art

Applicants respectfully submit that two documents cited by the Examiner, Fink et al. (U.S. Patent No. 6,496,935, filed March 2, 2000) and Derfler et al. ("How Networks Work," September 2000), are not prior art to the present application.

In the present application, Applicants have claimed priority to Applicants' provisional Application No. 60/176,625, filed January 19, 2000, which clearly antedates both Fink et al. and Derfler et al.

Applicants direct the Examiner's attention to (1) the Application Transmittal of Decmber 21, 2000, which amended the specification to claim priority, and (2) the Official Filing Receipt mailed March 7, 2001, which acknowledges that priority claim.

CONCLUSION

Applicants submit that the present application is in condition for allowance and respectfully request favorable action in the form of a Notice of Allowance. Should the Examiner believe that this application is in condition for disposition other than allowance, the Examiner is invited to contact the undersigned at the telephone number listed below in order to address the Examiner's concerns.

Respectfully submitted,

_____, 2003

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